

October 8, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Notice of Ex Parte Communications, IB Docket No. 18-313*

Dear Ms. Dortch:

This is to inform you that on October 7, 2019, Mat Dunn and David Goldman from Space Exploration Technologies Corp. ("SpaceX") met with Umair Javed and Jessica Martinez from Commissioner Rosenworcel's office and William Davenport from Commissioner Starks's office.

During this meeting, SpaceX explained the steps it is taking to mitigate orbital debris and maintain safe operations in space. SpaceX presented the charts in the attached slide to demonstrate how its low altitude helps maintain a clean orbital environment. SpaceX also reiterated its position on orbital debris. Namely, operators should create no calculated risk to human life, leave no persistent debris, take special care around the International Space Station, and limit the time in orbit after a satellite's useful life. Most critically, no rules can be effective unless they are applied to U.S. and non-U.S. operators alike. Applying rules only to U.S. licensees will drive overseas those operators who wish to avoid reasonable debris mitigation steps.

Very best regards,

David Goldman
Director of Satellite Policy

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Attachment

Low Earth Orbit Objects and Decay Times

- SpaceX is seeking an optimal operating orbit altitude balancing satellite mission performance, propulsion system capabilities, congestion and natural decay times
- Flying lower increases constellation size but reduces decay time and makes us better stewards of the space environment

